

**DECLARATION OF
VASILY PANFEROV
ISO GOOGLE LLC'S
RESPONSE TO THE
COURT'S 10/27/22
ORDER TO SHOW
CAUSE (DKT. 784)**

**Redacted Version of
Document Sought to
be Sealed**

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY**UNITED STATES DISTRICT COURT****NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION**

CHASOM BROWN, et al., individually and
on behalf of all similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

DECLARATION OF VASILY PANFEROV

1. I am a Senior Software Engineer at Google, where I work on source code for the logs processing backend for Google. In this capacity, I regularly work with the source code for Google's logging pipelines in the course of my day-to-day responsibilities. I have been a Google employee for more than nine years. I make this declaration of my own personal, firsthand knowledge, and if called as a witness, I could and would testify competently thereto.

2. I have reviewed the June 14, 2022 Declaration of Martin Šrámek served by Google in this litigation, which identified, among other logs, the following "[REDACTED] log that contains the "maybe_chrome_incognito" bit:

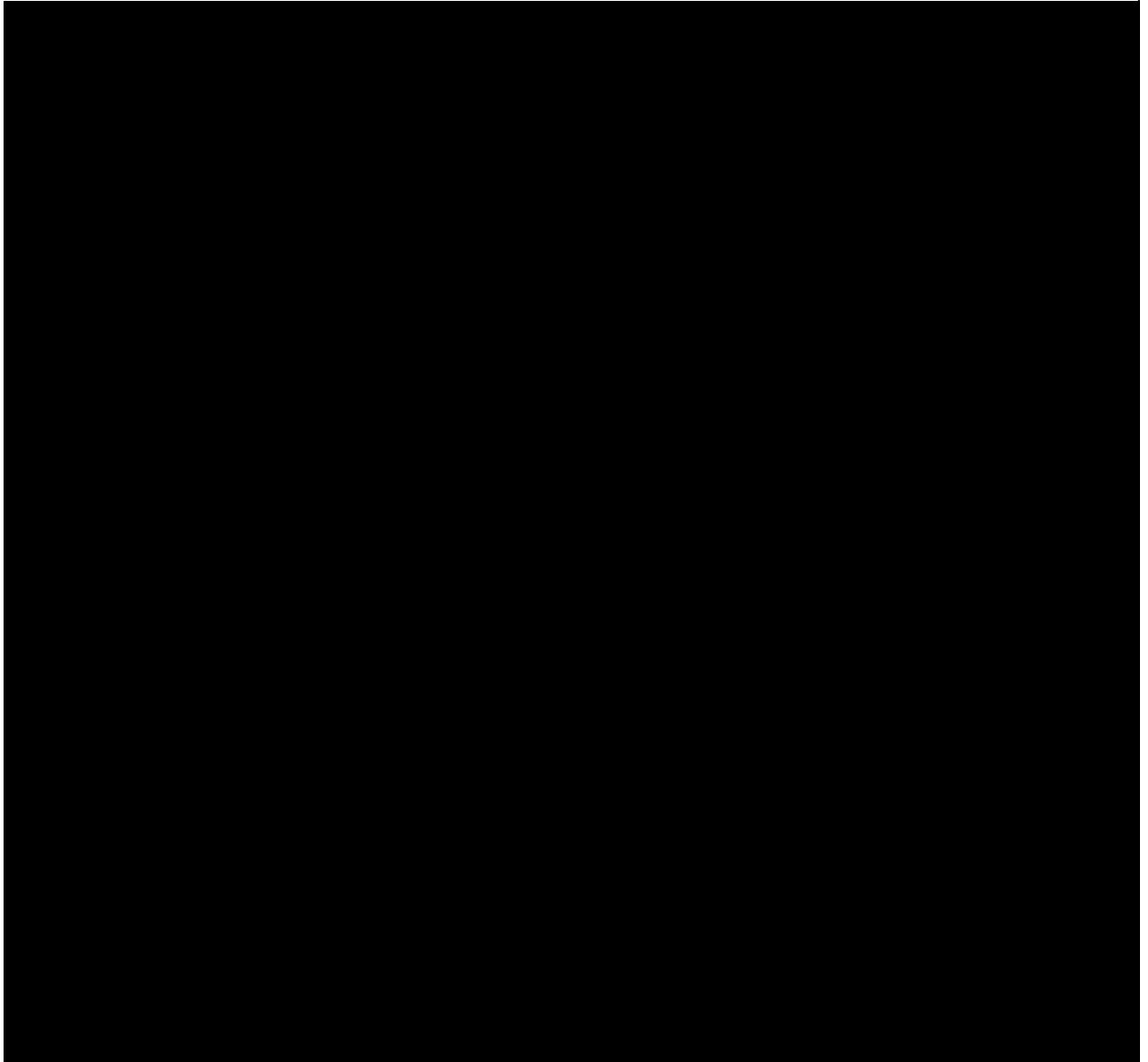
o [REDACTED]

3. I contributed to the code for the log identified in paragraph 2 ([REDACTED]), and I can confirm, based on my personal knowledge and review of the relevant code, that the log contains data from [REDACTED] logs as well as data from unauthenticated logs. But as explained below, it does not join data from [REDACTED] logs with data from unauthenticated logs (or join any records at all). This log contains the results of (i) sorting data from three unauthenticated logs [REDACTED], [REDACTED], and [REDACTED]; and (ii) sorting data from three authenticated logs [REDACTED], [REDACTED], and [REDACTED]

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1 U [REDACTED].

2 4. The instructions for sorting input logs data in the [REDACTED]
3 [REDACTED] log are only found in a source code file that defines the mapping
4 function of the ad events in p [REDACTED] I contributed to this
5 source code as part of my day-to-day job responsibilities at Google. The relevant section of this
6 source code is reproduced here:



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26 5. This code facilitates the sorting discussed above in paragraph 3. As explained below,
27 this code does not allow joining of authenticated data with unauthenticated data (or vice versa):

28 a. The yellow highlighted section above calls for any record from the input logs

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1 with a GAIA ID to be assigned a log key based on that GAIA ID and the
2 record's query ID, with no two records having the same log key.

- 3 b. Because of the "else if" condition, the blue highlighted section is only
4 implemented if there is no GAIA ID. This section causes any record from the
5 input logs for which no Gaia ID is present to be assigned a log key based on
6 the Zwieback ID and query ID in the record, with no two records having the
7 same log key.

8 6. Records in the [REDACTED] log can be joined
9 with another log [REDACTED] by the log key. The join is only possible
10 between log records that have the same GAIA ID and query ID or the same Zwieback ID and query
11 ID. In other words, unauthenticated data [REDACTED] is joined only with
12 unauthenticated data in [REDACTED]; and authenticated data in tmp-
13 [REDACTED] is joined only with authenticated data in [REDACTED].

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15 I declare under penalty of perjury that the foregoing is true and correct.

16 Executed on the 30th day of November, 2022 at Zurich, Switzerland.

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18 By: DocuSigned by:
19 *Vasily Panferov*
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21 Vasily Panferov
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